

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION AT CHICAGO**

LARRY J. COLLIER,)	
)	
Plaintiff,)	
)	
Vs.)	Case No.: 08 C 227
)	
WAL-MART STORES, INC.,)	
WAL-MART REAL ESTATE BUSINESS)	
TRUST, WAL-MAT ASSOCIATES, INC.,)	
WAL-MART.COM USA, LLC,)	
WAL-MART REALTY COMPANY,)	
WAL-MART STORES EAST, INC.)	
WAL-MART TRANSPORTATION, LLC)	
)	
Defendants.)	

RULE 26(f) DISCOVERY PLAN

1. Pursuant to Fed.R.Civ.P. 26(f), a meeting was held on April 23, 3008 via telephone and was attended by:

Bridgett Mitchell for plaintiff(s)
Pamela L. Pierro for defendant(s) Wal-Mart Stores, Inc. et al.

2. Pre-Discovery Disclosures. The parties will exchange by May 13, 2008 the information required by Fed.R.Civ.P. 26(a)(1).

3. Discovery Plan. The parties jointly propose to the court the following discovery plan:

Discovery will be needed on the following subjects: medical records and bills of plaintiff's treating physicians, permanency of condition, liability and causation of the injury.

All discovery commenced in time to be completed by March 1, 2009 . Written discovery to be propounded by May 13, 2008 and completed by June 20, 2008

Maximum of 35 interrogatories by each party to any other party. Responses due 45 days after service.

Maximum of 35 requests for admission by each party to any other party. Responses due 45 days after service.

Maximum of 5 depositions by plaintiff(s) and 5 by defendant(s).
Each deposition limited to maximum of 3 hours unless extended by agreement of parties.

Reports from retained experts under Rule 26(a)(2) due:
from plaintiff(s) by October 31, 2008
from defendant(s) by January 30, 2009

Supplementations under Rule 26(e) due 60 days thereafter.

4. Other Items.

The parties do not request a conference with the court before entry of the scheduling order.

The parties request a pretrial conference in November 2008.

Plaintiff(s) should be allowed until November 30, 2008 to join additional parties and until December 31, 2008 to amend the pleadings.

Defendant(s) should be allowed until January 31, 2009 to join additional parties and until February 28, 2009 to amend the pleadings.

All potentially dispositive motions should be filed by March 31, 2009.

Settlement is likely, but cannot be evaluated prior to November 2008.

Final lists of witnesses and exhibits under Rule 26(a)(3) should be due:
from plaintiff(s) by April 1, 2009
from defendant(s) by April 1, 2009

Parties should have 30 days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).

The case should be ready for trial by June 15, 2009 and at this time is expected to take approximately 5 days.

Date: April 23, 2008

/signed by all counsel

Thomas J. Tyrnell
Patricia J. [illegible]